

Debtor 1 Thomas Glaister, Jr.

Debtor 2 Ronnette Glaister
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania
(State)

Case number 17-10948-GLT

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 Court claim no. (if known): 1-1

Last 4 digits of any number you use to identify the debtor's account: 4 6 2 9

Property address: 2317 Mercer W Middlesex Rd
Number Street

West Middlesex, PA 16159
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 12 / 01 / 2022
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

 / /
MM / DD / YYYY

Debtor 1 Thomas Glaister, Jr.
First Name Middle Name Last Name

Case number (if known) 17-10948-GLT

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Elizabeth K. Holdren
Signature

Date 12 / 13 / 2022

Print Elizabeth K. Holdren
First Name Middle Name Last Name

Title Creditor's Counsel

Company Hill Wallack LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 21 Roszel Road, P.O. Box 5226
Number Street

Princeton, NJ 08543
City State ZIP Code

Contact phone (609) 734 - 6345

Email eholdren@hillwallack.com

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(PITTSBURGH)**

IN RE:

**Thomas Glaister, Jr.
Ronnelle Glaister
Debtor**

CHAPTER 13

CASE NO.: 17-10948-GLT

**WILMINGTON TRUST, NATIONAL
ASSOCIATION, NOT IN ITS INDIVIDUAL
CAPACITY, BUT SOLELY AS TRUSTEE FOR
MFRA TRUST 2015-1**

Movant

v.

**Thomas Glaister, Jr.
Ronnelle Glaister
Respondent**

CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties indicated below of (i) Response to Notice of Final Cure of WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2015-1:

Date Served (ECF) or Mailed: December 13, 2022

Thomas Glaister, Jr.
2317 Mercer West Middlesex
Road
West Middlesex, PA 16159

Ronnelle Glaister
2317 Mercer West Middlesex
Road
West Middlesex, PA 16159

**Debtors
Via Regular Mail**

Paul W. McElrath, Jr.
McElrath Legal Holdings, LLC
1641 Saw Mill Run Boulevard
Pittsburgh, PA 15210
**Debtor's Counsel
Via ECF**

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
**Chapter 13 Trustee
Via ECF**

U.S. Trustee
Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
**U.S. Trustee
Via ECF**

By: /s/ Elizabeth K. Holdren

**Elizabeth K. Holdren, Esq.,
Atty ID 78948**
Hill Wallack LLP
21 Roszel Road, P.O. Box 5226
Princeton, NJ 08543
609-734-6345
eholdren@hillwallack.com